

MARK J. BENNETT 2672  
Attorney General of Hawai'i

JAMES E. HALVORSON 5457  
NELSON Y. NABETA 3004  
Deputy Attorneys General  
Department of the Attorney  
General, State of Hawai'i  
235 S. Beretania Street, 15<sup>th</sup> Floor  
Honolulu, Hawai'i 96813  
Telephone: (808) 587-2900  
Facsimile: (808) 587-2965  
E-Mail: Nelson.Y.Nabeta@hawaii.gov

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII, DEPARTMENT  
OF EDUCATION; PATRICIA  
HAMAMOTO, Superintendent of  
Hawai'i Schools; MEREDITH  
MAEDA, Principal, Castle High  
School; SARA GRONNER or  
GRONNA, Vice Principal of Castle  
High School,

Defendants.

Civil No. 04-00390 JMS/KSC

DEFENDANTS' MOTION IN LIMINE  
TO PRECLUDE THE  
INTRODUCTION OF EVIDENCE  
REGARDING OTHER LAWSUITS  
OR CHARGES OF  
DISCRIMINATION INVOLVING  
DEFENDANTS; MEMORANDUM IN  
SUPPORT OF MOTION;  
CERTIFICATE OF SERVICE

Trial: March 28, 2007

Judge: The Honorable  
J. MICHAEL SEABRIGHT

**DEFENDANTS' MOTION IN LIMINE TO PRECLUDE THE  
INTRODUCTION OF EVIDENCE REGARDING OTHER LAWSUITS  
OR CHARGES OF DISCRIMINATION INVOLVING THE DEFENDANTS**

COMES NOW, Defendants STATE OF HAWAII, DEPARTMENT OF EDUCATION, and in their official capacities, PATRICIA HAMAMOTO, MEREDITH MAEDA AND SARAH GRONNA, and in their individual capacities, MEREDITH MAEDA AND SARAH GRONNA (referred to collectively as "Defendants"), by and through their attorneys, Mark J. Bennett, Attorney General, and James E. Halvorson and Nelson Y. Nabeta, Deputy Attorneys General, hereby moves this Court for an order prohibiting Plaintiff from introducing evidence of other lawsuits or charges of discrimination involving Defendants.

This motion is made pursuant to the Court's Second Amended Rule 16 Scheduling Order filed on February 22, 2007, Rule 7 of the Federal Rules of Civil Procedure, and Rules 7.1 and 16.9 of the Local Rules of Practice for the United States District Court for the District of Hawai'i, and is based upon the accompanying supportive memorandum and the records and files herein.

DATED: Honolulu, Hawaii, March 7, 2007.

/s/ NELSON Y. NABETA  
NELSON Y. NABETA  
Deputy Attorney General

Attorney for Defendants